

BATHAE DUNNE LLP

Yavar Bathae (CA 282388)
yavar@bathaeedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
Andrew C. Wolinsky
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
633 West Fifth Street, 26th Floor
Los Angeles, CA 90071
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Class*

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Kristen M. Anderson (CA 246108)
kanderson@scott-scott.com
230 Park Avenue, 17th Floor
New York, NY 10169
Tel.: (212) 223-6444

Christopher M. Burke (CA 214799)
cburke@scott-scott.com
David H. Goldberger (CA 225869)
dgoldberger@scott-scott.com
Kate Lv (CA 302704)
klv@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE IN
SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am an attorney at Bathaee Dunne LLP, Interim
4 Co-Lead Counsel for the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge
5 of the facts set forth herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
7 Consider Whether Another Party's Material Should Be Sealed, filed in connection with the concurrently
8 filed First Amended Consolidated Advertiser Class Action Complaint ("FAC").

9 3. Certain documents and information referenced in the FAC have been designated by
10 Defendant Meta Platforms, Inc., as "Confidential" or "Highly Confidential" under the Stipulated
11 Protective Order (Dkt. No. 111).

12 4. Portions of the FAC referencing or reflecting the contents of the documents and
13 information designated by Meta Platforms as "Confidential" or "Highly Confidential" have been
14 redacted from the publicly filed version of the FAC. *See* Civil L.R. 79-5(e)(1).

15 5. An unredacted version of the FAC with these references highlighted is filed herewith.
16 *See* Civil L.R. 79-5(e)(2), (f)(1).

17 6. Per Judge Koh's order of January 14, 2022, also filed herewith is an unredacted redlined
18 complaint comparing the FAC to the previously operative Consolidated Advertiser Class Action
19 Complaint. *See* Dkt. No. 214 at 107.

20 7. Advertiser Plaintiffs' request is limited to documents and information produced by Meta
21 Platforms marked Confidential or Highly Confidential, or information directly reflecting documents
22 and information produced by Meta Platforms marked Confidential or Highly Confidential. This request
23 is thus narrowly tailored to seek sealing only of potentially sealable material.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on February 28, 2022, in Pasadena, California.

26 s/ Brian J. Dunne
27 Brian J. Dunne
28